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November 6, 2023

**VIA ECF**

Hon. Jennifer E. Willis, USMJ  
US District Court for the  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

This request is GRANTED. SO ORDERED.

A handwritten signature in black ink that reads 'Jennifer E. Willis'.

Jennifer E. Willis  
United States Magistrate Judge

November 8, 2023

**Re: Sharon Goldzweig v. Consolidated Edison Company of New York, Inc.,  
Civil Action No. 1:20-cv-04297-GBD-JW (S.D.N.Y.)**

Dear Judge Willis:

We represent Consolidated Edison Company of New York, Inc. ("Con Edison") in the above-captioned action. Together with counsel for Plaintiff Sharon Goldzweig, the parties write to provide the Court with a status update and request an extension of the current deadline to submit a dispositive motion schedule under the Civil Case Management Plan and Scheduling Order and prior so-ordered status updates (ECF No. 76) through January 26, 2024 to allow the parties to complete a private mediation.

Since the parties' October 27, 2023 joint status update (ECF No. 75), the parties agreed that a private third party mediator would assist the parties in facilitating a resolution based on their respective positions. To that end, parties have agreed to a mediator, confirmed terms for the mediation, and plan to complete mediation in January 2024 based on the soonest available dates of the selected mediation as well as the necessary parties and counsel. To allow the parties to complete mediation and potentially resolve this action, the parties request an extension of the current deadline to provide a dispositive motion schedule from November 3, 2023 to January 26, 2024, whereby the parties will advise the Court of the outcome of mediation and provide a briefing schedule for summary judgment, if necessary. No other deadlines in the Civil Case Management Plan and Scheduling Order require adjustment. This request is made in good faith and furtherance of resolving this matter.

We thank Your Honor for her kind consideration of this request.



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Respectfully submitted,  
SEYFARTH SHAW LLP

*/s/ Ephraim J. Pierre*

Ephraim J. Pierre

cc: All Counsel of Record (via ECF)